

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JOHN DOE,

*Petitioner,*

v.

PATRICK M. SHANAHAN,  
in his official capacity as ACTING  
SECRETARY OF DEFENSE,

*Respondent.*

No. 17-cv-2069 (TSC)

**CONSENT MOTION FOR AN EXTENSION OF BRIEFING DEADLINE  
CONCERNING PETITIONER’S MOTION TO UNSEAL**

Petitioner hereby respectfully requests an extension of time within which to file the reply brief on Petitioner’s pending motion to unseal. *See* ECF No. 131 (Apr. 8, 2019). Good cause exists to grant this motion. On May 21, 2019, Respondent filed his sealed opposition to Petitioner’s motion to unseal. *See* ECF No. 137. That filing contained a sealed declaration by Mark E. Mitchell of the Department of Defense that, for the first time, informed Petitioner of the detailed factual basis for Respondent’s current position. In order to continue a careful evaluation of Respondent’s claims, and to allow the parties time to consider potential avenues of resolving Petitioner’s motion to unseal without the need for further litigation, Petitioner seeks a two-week extension of his reply-brief deadline. Counsel for Respondent consents to this request.

Accordingly, Petitioner respectfully requests that the Court extend Petitioner’s deadline to file his reply brief on the motion to unseal up to and including June 21, 2019.

Dated: June 4, 2019

Respectfully submitted,

/s/ Brett Max Kaufman

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**[PROPOSED] ORDER GRANTING CONSENT MOTION FOR AN EXTENSION OF  
BRIEFING DEADLINE CONCERNING PETITIONER'S MOTION TO UNSEAL**

Upon consideration of Petitioner's Consent Motion for an Extension of Briefing Deadline Concerning Petitioner's Motion to Unseal, and for good cause shown, the motion is GRANTED. Accordingly, it is ORDERED that Petitioner shall file a reply on or before June 21, 2019.

Dated: June \_\_\_, 2019

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Tanya S. Chutkan  
United States District Judge